Federal Defenders

Case 1:20-cr-00026-PAC Document 20 Filed 06/04/20 Page 1 of 2 OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton Executive Director and Attorney-in-Chief Southern District of New York Jennifer L. Brown Attorney-in-Charge

By ECF/Email

Honorable Paul A. Crotty United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

United States v. Donald Smith, 20 Cr. 26 (PAC) Re:

June 3, 2020

6-4-20 Bail is modified to allow travel between the Southern District of New York and the Western District of Virginia. SO ORDERED.

Paul A Cith

Honorable Judge Crotty:

I write to respectfully request that the Court modify Donald Smith's bail conditions so that he is permitted to live in Martinsville, Virginia with the former pastor of his church and the pastor's wife. As detailed in paragraph 55 of the Presentence Report, Mr. Smith has known the couple for fifteen years and planned to move in with them in their studio apartment as soon as possible. The move is more urgent, now, because Mr. Smith recently suffered a seizure and nobody was aware of his condition until another resident of his supportive housing discovered him in the bathroom. Mr. Smith would benefit from having close friends nearby to help him with the medical attention he may need.

I have conferred with Pretrial Services and they take no position. His supervising officer believes Mr. Smith is compliant with the conditions of supervision. The government defers to Pretrial Services on this application.

If the Court grants the application, I respectfully request that the Court also modify his bail conditions to permit him to travel between the Southern District of New York and the Western District of Virginia as required.

Honorable Paul A. Crotty United States District Judge June 3, 2020 Page 2 of 2

As a final note, the parties are conferring about proposing a new date for sentencing and we will update the Court once this application is resolved.

Respectfully submitted,

/s/ Annalisa Mirón
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cc: AUSA Samuel Rothschild
Pretrial Services Officer Mohamed Ahmed